

Call for Data Related to Review of National Monuments under EO 13792 (April 26, 2017)

1. Documents Requested

a. Resource Management Plans/Land Use Plans

i. The Monument Management Plan (MMP) and ROD is located within this Drive folder (1.GSENM_mgmt_plan.pdf).

ii. The entire GSENM RMP (DEIS/FEIS/ROD) can be accessed here:

<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageld=94418>

iii. The Livestock Grazing EIS/Plan Amendment has been initiated. The DEIS has been reviewed by the UTSO and WO and is nearing public release:

<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageld=100826>

iv. The MMP has also been amended for Greater Sage Grouse habitat conservation (2015), for an electrical transmission line ROW to support local communities (2011), and for an update to fire management (2005).

b. Record of Decision

i. The 1999 MMP and ROD is located within this Drive folder (1.GSENM_mgmt_plan.pdf).

c. Public Scoping Documents

i. Grand Staircase-Escalante National Monument's (GSENM) Management Plan included substantial outreach, public scoping and comment periods according to land use planning regulations and policies. See Federal Register Notices in Drive folder (1.c.Federal Register, Volume 64 Issue 145 (Thursday, July 29, 1999).pdf).

ii. Public Comments and Responses for the MMP FEIS are located within this Drive folder (1.c.GSENM_FEIS_Comments.pdf).

iii. See also Scoping Report for Livestock Grazing EIS (1.c.GSENM_GrazingEIScopingRpt_Final.pdf) and at:

https://eplanning.blm.gov/epl-front-office/projects/lup/69026/89803/107384/2014.05.21_GSENM_ScopingRpt_Final_508.pdf.

iv. GSENM has many documents to demonstrate public engagement in land use planning processes. Please advise on the level of documentation that is

requested by the Department.

d. Presidential Proclamation

- i. Proclamation 6920 of September 18, 1996 is in this folder (1.d.Presidential_Proclamation_6920.pdf).

2. Information on activities permitted at the Monument, including annual levels of activity from the **date of designation to the present**

Designation date for GSENM is September 18, 1996.

a. Recreation - annual visits to site

- i. To protect Monument resources and provide economic opportunities in the local communities, major facilities including the four visitor centers are located in the gateway towns of Kanab, Cannonville, Escalante, and Bigwater.
- ii. GSENM provides a large variety of multiple-use recreation opportunities including traditional hiking and camping, hunting, fishing, horseback riding, mountain biking, as well as motorized activities for off-highway vehicles.
- iii. Commercial recreation activities (Outfitter and Guides) have risen since Monument designation (2.a._GSENM Commercial_SRP.pdf).
- iv. GSENM uses the Recreation Management Information System (RMIS) to report visitor use, which is calculated using data from multiple traffic counters, permits and visitor counts in the four Visitor Centers. RMIS is generally accepted as the agency's official record, however, RMIS was not available until 1999. Prior to 1999, GSENM aggregated data from the Kanab and Escalante offices. (See: 2.a.GSENM_RecreationData_Excel.xls and 3.a.GSENM_Recreation_MMP_DEIS_Tables.pdf)

b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)

- i. All Valid Existing Rights for leaseable minerals including coal, and oil and gas are continued.
- ii. No new leases have been issued since designation. GSENM has no commercial renewable energy.
- iii. The annual production of oil and gas in the GSENM is currently limited to lands in or adjacent to the Upper Valley Unit (UVU) in the north-central area of the GSENM (Attachments: 2.b.Upper Valley Unit Map.pdf; 2.b.Upper Valley GSE Production.pdf; 2.b.Upper Valley Wells in GSENM.xls; and 2.b.UDOGM_O&Gprod_data_Upper Valley.pdf). GSENM shares the Upper Valley

Oil Field with the Dixie National Forest; this field accounts for all oil and gas production in GSENM. Attached documents disclose production for the Upper Valley Field. Four wells within the GSENM are currently producing oil and a small amount of gas. The UVU was approved in 1962 and production from the wells peaked in 1972 at 183,133 barrels. In the last 20 years, 1997-2016, production has slowly declined from about 65,828 barrels of oil and no gas annually to 45,538 barrels of oil and 2,357 mcf of gas. There is no other oil and gas production in GSENM, or Kane and Garfield Counties.

- iv. No coal lands have been explored or coal produced within the GSENM since the September 18, 1996 designation. Existing coal leases were relinquished in exchange for Federal payments totaling \$19.5 million (not adjusted for inflation) (2.b.GSENM Coal Lease Cancellation Payments.pdf)

v. **PLACEHOLDER:** HOW MANY MILLION TONS OF RECOVERABLE COAL ARE WITHIN ORIGINAL LEASES?

- vi. Information related to energy transmission infrastructure and lands and realty actions is included in the table below:

Commented [1]: Ex. 5 Deliberative Process Privilege

Grand Staircase-Escalante National Monument Existing Rights-of-Way/Permits/Authorized 09/25/1996 – 05/15/2017	
Existing Withdrawals: PSR, PWR, Bureau of Reclamation, Forest Service Wilderness, Power Site, National Park Service, In Trust for Indians	17
Road ROWs	19
Misc. Roads and Associated Uses - Sec 107 Federal Aid Hwy, RS2477, Mineral Material Sites	0
Power Transmission Lines and Power Facilities	20
Communication Sites – Telephone, Telegraph, Radio Transmission, Global Positioning Systems	15

Water ROWs, Irrigation Facilities	14
Oil and Gas Pipelines, Oil and Gas Facilities	5
Other FLPMA ROWs, Perpetual Easements, Federal Facilities	2
Airport	0
Permit - 302 FLPMA – Misc.	0
Permits Film - 302 FLPMA (popular location (closed))	54

c. Minerals - annual mineral production on site

i. Mineral materials

- No new Free Use, commercial, or over-the-counter permits have been issued since Monument designation.
- Valid existing permits, including those in Title 23 (3 Federal Highway Rights of Way), continue to be recognized until permit expiration.
- Significant quantities of gravel and riprap from existing pits continue to be provided for Federal Highways projects, primarily to Utah Department of Transportation.
- According to UGS Circular 93, January 1997, "A Preliminary Assessment of Energy and Mineral Resources within the Grand Staircase-Escalante National Monument" (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf) there were five small mining operations on unpatented mining claims, four of which were active alabaster quarries and one, a suspended operation for petrified wood. Annual production of the alabaster was about 300 tons worth \$500 per ton (\$150,000/yr). These claimants failed to pay the required annual filings and therefore, the claims were terminated. The BLM's decision to close the claims was upheld by IBLA in March 2008. Since that time, there have been no mining law operations within the monument.

ii. Locatable Minerals

- No new mining claims were issued after Monument designation, however existing claims and active mines were allowed to continue. (List of active mines in MMP DEIS located within this Drive folder 2.c. MMP_DEIS Table 3.10_Locatables.pdf).
- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
 - i. No commercial timber production pre/post Monument designation.
 - ii. GSENM does allow continued firewood cutting in two fuel wood cutting locations.
- e. Grazing - annual grazing on site (AUMs permitted and sold)
 - i. Grazing on the Monument Fact Sheet (2.e_GSENM Grazing EIS Fact Sheet 05-08-2017.pdf).
 - ii. Grazing AUMs/ Permitted and billed (2.e._GSENM Grazing AUMs).
 - iii. When the Monument was designated, there were 106,645 total AUMs, with 77,400 of these active. Today, there are 106,202 total AUMs and 76,957 are active. In 1999, an adjustment in AUM levels was made to resolve riparian resources issues and address recreation conflicts.
- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - i. **Subsistence activities** are those that provide the bare essentials for living: food, water, and shelter. The Federal Subsistence Management Program provides opportunities for subsistence way of life in Alaska on federal public lands and waters. There are no formal subsistence programs outside of Alaska. There are no known true subsistence activities occurring on GSENM or prior to its designation. GSENM does provide for the collection of certain natural materials by Native American Indians, under BLM permit. RMIS data provides the number of permitted/guided and recreational hunting activities, fishing activities and gathering activities (See: 2.a.GSENM_RecreationData_Excel.xls). These numbers do not reflect the actual number of licensed hunters/fishermen. That data is available from Utah Division of Wildlife Resources. Outside of developed recreation sites, the entire GSENM is open for hunting and fishing, which is regulated by Utah Division of Wildlife Resources.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available

- i. Archeological/cultural data is provided in the following Utah Division of State History Maps in the google drive (2.g.1_GSENM_SiteDensity, 2.g.2_GSENM_Inventories, 2.g.3_GSENM_ArchSites, 2.g.4_GSENM_ArchNumofSites).
- ii. Archaeological surveys carried out to date, show extensive use of places within the monument by ancient Native American cultures and a contact point for Anasazi and Fremont cultures. The cultural resources discovered so far in the monument are outstanding in their variety of cultural affiliation, type and distribution. Hundreds of recorded sites include rock art panels, occupation sites, campsites and granaries. Cultural sites include historic and prehistoric sites, Traditional Cultural Properties, Native American Sacred Sites and cultural landscapes.
- iii. According to the Utah SHPO, as of March 6, 2017, there are 3,985 recorded archaeological sites within the Grand Staircase-Escalante National Monument (GSENM)(2.g.4_GSENM_ArchNumofSites). However, the GSENM staff estimates that there are more likely around 6,000 recorded archaeological sites within the GSENM. This is with only five to seven percent of the Monument surveyed. The GSENM staff believes the SHPO does not have all of the site forms for this area.
- iv. Cultural Values (Tribal): Prehistoric archaeological sites in the GSENM include pottery and stone tool (lithic) scatters, the remains of cooking features (hearths), storage features such as adobe granaries and sub-surface stone lined granaries, prehistoric roads, petroglyphs, pictographs and cliff dwellings. Historic sites include historic debris scatters, roads, trails, fences, inscriptions, and structures. Following the designation of GSENM, consultations were initiated with the Native American tribes associated with the GSENM area, including the Hopi, the Kaibab Paiute, the San Juan Paiute, the Paiute Indian Tribes of Utah, the Zuni, and the Ute, and the Navajo. Over the past 20 years, the Hopi and the Kaibab Paiute have been most closely associated with the Monument and most responsive to continued consultations, as the GSENM area is central to the historic and prehistoric territories of these two tribes. All tribes considered the Monument area to be culturally important; the Hopi (as the modern descendants of the Ancestral Puebloans), for example, can trace the migrations of at least twelve clans through what is today GSENM (Bernardini 2005). The tribal connections to this land are probably best described by an example from

the Kaibab Paiute, as related to ethnographers from the University of Arizona, as follows (Stoffle et al 2001): *“The Southern Paiute people continue to maintain a strong attachment to the holy lands of their ethnic group as well as to their own local territory. These attachments continued even though Paiute sovereignty has been lost over portions of these lands due to Navajo ethnic group expansion, encroachment by Euro Americans, and Federal government legislation. Despite the loss of Paiute sovereignty over most traditional lands, Southern Paiute people continue to affiliate themselves with these places as symbols of their common ethnic identity. Additionally, all Southern Paiute people continue to perform traditional ceremonies along with the menarche and first childbirth rites of passage rituals. The locations at which these ceremonies and rituals have been or are currently performed become transformed from secular “sites” to highly sacred locations or places. By virtue of the transformation of locations into sacred places, Southern Paiute people reaffirm their ties to traditional lands because they have carried out their sacred responsibilities as given to them by the Creator.”*

- v. **Cultural values (Ranching)** Local ranching began in the 1860s, and became a major focus of area livelihood following the cessation of the Blackhawk War and increased settlement in the 1870s. Ranching was initially small scale and for local subsistence, but the herds quickly grew so that by the late 1800s the raising of cattle, sheep, and goats was of major economic importance. Ranching and subsistence farming was historically the backbone of the local economies, and this is still reflected in the views of the modern communities surrounding GSENM. In modern times the economic importance of ranching has somewhat diminished, but the culture of, and past history of, livestock grazing and ranching is one of the important “glues” that binds local communities and families in the GSENM area.

3. Information on activities occurring during the **five years prior to designation**

- a. Recreation - annual visits to site
 - i. The BLM transitioned to RMIS in 1999. Data prior to 1999 is not available in the same reporting mechanism as from 1999-Present. GSENM did report visitor use beginning in FY97. (See: 2.a.GSENM_RecreationData_Excel.xls and 3.a.GSENM_Recreation_MMP_DEIS_Tables.pdf).
- b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of

energy transmission infrastructure on site (if any)

- i. The Upper Valley Oil Field was in production prior to designation; no other oil and gas production existed in Kane and Garfield Counties. From 1992 until 1996, 336,313 barrels of oil were produced in the GSENM. No natural gas was produced during that time. (2.b.Upper Valley GSE Production.pdf).
- ii. No coal was produced from the GSENM in the five years preceding designation. However, exploration activities and planning for mining operations continued from the 1980's until the monument designation.
 - A regional analysis/FEIS for mining was completed in 1979, noting that 64 coal leases (~168,000 acres) were committed (3.b.FINAL EIS - Dev of Coal Resources in Southern Utah.pdf)
 - A major coal mine (Andalex Resources' Smoky Hollow Mine) was planned in the mid-1990's and an EIS was initiated.
 - 700+ exploration drill holes were completed prior to GSENM designation to determine the thickness of coal underground (See: <https://pubs.usgs.gov/of/1996/OF96-539>)
- iii. Information related to energy transmission infrastructure and lands and realty actions is included in the table below:

Commented [2]: Ex. 5 Deliberative Process Privilege

<p>Grand Staircase-Escalante National Monument Existing Rights-of-Way/Permits/All Dispositions Authorized/Closed/Relinquished/Withdrawn/Expired/Terminated/Cancelled/Pending/ Rejected/Void 01/01/1991 – 09/24/1996 <i>(In March 1999, BLM added Case Recordation components to the LR2000 Database System; therefore, some of the pre-LR2000 data may remain in the Status Database)</i></p>	
Existing Withdrawals: PSR, PWR, Bureau of Reclamation, Forest Service Wilderness, Power Site, National Park Service, In Trust for Indians	1

Roads ROWs	8
Misc. Roads - Sec 107 Federal Aid Hwy, RS2477, Mineral Material Sites	1
Power Transmission Lines & Power Facilities	1
Communication Sites – Telephone, Telegraph, Radio Transmission, Global Positioning Systems	1
Water ROWs, Irrigation Facilities	0
Oil & Gas Pipelines, Oil & Gas Facilities	2
Other FLPMA ROWs, Perpetual Easements, Federal Facilities	6
Airport	0
Permit - 302 FLPMA – Misc.	25
Permits Film - 302 FLPMA (popular location (closed))	0

- c. Minerals - annual mineral production on site
 - i. For mining law operations (43 CFR 3809), the alabaster quarries were the only authorized locatable minerals operation (06/30/1986) in the area prior to designation. Several existing Alabaster mining operations are located in Kane County.
 - ii. Mineral materials, primarily sand and gravel and riprap, were extracted from developed pits by counties and commercial entities for local use. There were eight Mineral Material Cases in the monument at designation, and most were Free Use Permits granted to the county.
- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
 - i. No commercial timber production pre/post Monument designation.
- e. Grazing - annual grazing on site (AUMs permitted and sold)

- i. See Grazing AUMs/Permitted and billed (2.e.GSENM Grazing AUMs.pdf).
 - f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - i. There are no known true subsistence activities occurring on GSENM or prior to its designation. Recreational fishing, hunting and gathering data from RMIS is not available prior to designation.
 - g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
 - i. In the five year period prior to designation of GSENM, a total of approximately 358 cultural resource sites were documented in what was to become GSENM, or about 72 sites/year. Following designation, approximately 3,219 sites were documented, or about 161 sites/year. This increase reflects the increased funding and greater research opportunities following GSENM designation.
4. Information on activities that likely would have occurred annually from the date of designation to the present **if the Monument had not been designated**
- The answers to this question are highly speculative. The question is best answered with qualitative (rather than quantitative) data. As GSENM was designated 20 years ago, the factors affecting such projections are subject to a wide range of variables (many of which are outside of BLM's purview, such as market prices).**
- a. Recreation - annual visits to site
 - i. Research by external parties (e.g., Headwaters Economics and Pew Trust reports) indicate that protected landscapes are a draw for visitors and do result in increased visitation to a region. Thus, it is reasonable to conclude that visitation would be less if the lands had not been designated as a monument.
 - b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)

Commercial speculation depends on the price of commodities.

 - i. Except for the Upper Valley Field, there have been no oil and gas discoveries within the GSENM. Forty-seven exploratory wells have been drilled; exploration activities were relatively sparse and cover an average of 57 square miles per well (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf, page iv).
 - ii. An Application for a Permit to Drill (APD) was submitted for valid existing leases within the Circle Cliffs Unit. The APD was neither approved nor rejected and the

lessee allowed the leases to terminate.

- iii. Four wildcat oil and gas wells have been drilled on GSENM since designation (1997-1999); none went into production.
- iv. Coal: Andalex coal leases were voluntary sold to the Land and Water Conservation Fund (LWCF) at market value. At the time, an EIS was in the works to support the proposed mine. It is unknown if the company would have followed through with development.
- v. It is reasonable to conclude that absent a national monument designation, there could be additional opportunities for oil and gas exploration, discovery and development.
- vi. Since there have been no discoveries upon which to base production numbers, estimates of the value of production vary widely. In January 1997, it was speculated that total value of coal-bed natural gas and petroleum within the GSENM ranged between \$2.02 and \$18.6 billion (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf, page ii).
- vii. The Kaiparowits plateau contains one of the largest coal deposits in the United States. The draft EIS for the Smoky Hollow Mine and the Alton coal mine producing from adjacent private lands provide an example of the development potential. State and County revenues would likely have increased significantly.
- viii. Absent a monument designation, the federal/SITLA land exchange would likely not have occurred.
- ix. Recent advances in underground coal mining techniques would likely result in the development of additional large areas of Kaiparowits coal resources that were not considered minable in the 1990's.
- x. Applications for rights of way and other energy transmission infrastructure would likely have risen in accordance with opportunities for mineral development.

c. Minerals - annual mineral production on site

- i. Counties and commercial entities would have continued to utilize and have improved access to sand/gravel from community pits.
- ii. Limited number of new alabaster mines, depending on the market.
- iii. Absent monument designation, it is likely that the relinquished alabaster claims would have been relocated and additional alabaster mining claims would have been filed. For the alabaster quarries, "Over a 30-year period, the quarries

Commented [3]: Ex. 5 Deliberative Process Privilege

- should generate \$4.5 million in production.” (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf)
- iv. The UGS mineral report stated, “Various types of metallic-mineral deposits are known to be present in the monument (figure 14). Most of these are small and low-grade with uncertain likelihood of significant development.” The report addressed specific minerals with known or potential deposits within the monument, but they determined at that time they were probably not commercial quality due to low, often sub-economic grades and limited tonnage. Thus, it is unlikely that metallic mining would have occurred. (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf)
 - v. There would most likely be additional mineral material sites for sand and gravel and the existing Free Use Permits granted to Kane County would most likely still be in use.
- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
- i. There is little harvestable lumber on the Monument (a little more than 1,000 acres of ponderosa). The mill harvested trees from the surrounding Dixie National Forest. The closure of the mill in Escalante was not connected to timber harvest on BLM lands.
- e. Grazing - annual grazing on site (AUMs permitted and sold)
- i. Grazing/ AUMs permitted and sold would likely have remained the same.
 - ii. Grazing is and was managed by applicable laws and regulations. As stated in the Proclamation; “Nothing in this proclamation shall be deemed to affect existing permits or leases for, or levels of, livestock grazing on Federal lands within the monument; existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation.”
 - iii. Although grazing use levels have varied considerably from year to year due to factors like drought, no reductions in permitted livestock grazing use have been made as a result of the Monument designation.
- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
- i. No likely changes or statistically significant differences from the reported RMIS data.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable

information where available

- i. Less inventory would have likely occurred without the Monument designation. The Resource Areas averaged about 72 sites/year inventoried. After designation, the average was about 161 sites/year.
- ii. More vandalism would have likely occurred without Monument designation. After designation, research, inventory and educational and interpretive outreach programs increased. Between 1996 and 2006, GSENM presented more than 500 talks, classroom visits, field trips and other educational events relating to cultural resources and archeology. Education, increased presence of staff and researchers and improved management likely led to the reduction in numbers of sites looted and rock art panels defaced.
- iii. Less archeological research would have occurred without the Monument Designation. Early GSENM efforts included initiating large, landscape surveys which recorded and documented hundreds of sites.

5. Changes to boundaries - dates and changes in size

- i. Monument Designation September 18, 1996 (1,878,465 acres).
- ii. H.R.3910, Automobile National Heritage Area Act, Public Law 105-355, Nov. 6, 1998, 112 Stat. 3253. 1,884,011 acres, net gain of approximately 5,546 acres (Documents located within this Drive folder 5.a.H.R.3910_Automobile National Heritage Area Act Synopsis)
- iii. H.R.377, Public Law 111-11, 2009, Boundary change and purchase for Turnabout Ranch, approximately 25 acres removed from GSENM (Documents located within this Drive folder 5.c.GSENM_Boundary_SaleHR3777_PL111-11_Turnabout.pdf)
- iv. Utah Schools and Land Exchange Act 1998: State of Utah School and Institutional Trust Lands Administration lands within the boundaries of GSENM were exchanged. The Federal government received all State inholdings in GSENM (176,699 acres) while the State Received \$50 million plus \$13 million in unleased coal and approx 139,000 acres including mineral resources. The Federal Government received additional State holdings within other National Park Service and US Forest Service units. (5.1998_Utah school Land Exchange_PL105-335.pdf)
- v. Small acquisitions of inholdings, private land located within the Monument boundary, have occurred since designation. The acquisitions have not resulted

in boundary adjustments, but have increased total federal land ownership.
More information is available upon request.

6. Public Outreach prior to Designation - outreach activities conducted and opportunities for public comment

- i. No public outreach documents are available.

7. Terms of Designation

- i. Refer to Proclamation for the terms of designation.
- ii. GSENM has additional data describing terms of the designation
 - Presidential remarks announcing the designation of GSENM (7.1_Remarks Announcing GSENM_pg1782-2).
 - Secretary of the Interior Memo to the President describing the objects and providing a listing of Monument Objects and a bibliography of Monument object data (7.2_8-15-96 Secretarial_Memo).
 - Secretary of the Interior Memo to the BLM Director describing Interim Management Direction for GSENM (7.3_11-6-96 Secretarial_Memo).